

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**ALLEN BOWMAN, et al**  
Individually and on behalf of all others  
similarly situated,

**Plaintiffs,**

vs.

**CJ & J DAVIS, INC.,**

**Defendant.**

**CASE NO.: 3:17-cv-01633**

**Judge Jeffrey Helmick**

**STIPULATION FOR ENTRY OF  
CONSENT JUDGMENT**

**Whereas**, Allen Bowman and Tatyana Hamilton (hereinafter collectively referred to as “Plaintiffs”) commenced the above captioned action against Defendant CJ & J Davis, Inc. (“Defendant”) on or about August 4, 2017. Now come the Parties, by and through their respective counsel, who have authority to enter into this Consent Judgment Entry, and hereby stipulate and agree as follows:

1. Without admitting liability, Defendant wishes to resolve this matter and hereby consents to entry of judgment in the above-captioned case.
2. This Court has subject matter and personal jurisdiction over the Defendant.
3. Entry of this Consent Judgment will resolve only this civil action, and does not preclude Defendant from contesting liability in any other matter or proceeding.
4. The parties waive entry of findings of fact and conclusions of law under Rule 52 of the Federal Rules of Civil Procedure.

**CONSENT JUDGMENT ENTRY**

**NOW THEREFORE**, without trial or adjudication of issues of fact or law, without this Consent Judgment constituting evidence against Defendant except as otherwise noted, and upon consent of Defendant, the Court finds that there is good and sufficient cause to enter this Consent Judgment,

**IT IS HEREBY ORDERED** that Defendant CJ & J Davis, Inc. (“Defendant”) shall pay the following as damages to Plaintiffs Allen Bowman and Tatyana Hamilton:

1. Judgment against Defendant and in Plaintiff Allen Bowman’s favor in the amount of \$10,000.00, as payment of wages and liquidated damages;
2. Judgment against Defendant and in Plaintiff Tatyana Hamilton’s favor in the amount of \$10,000.00, as payment of wages and liquidated damages;
3. Judgment against Defendant and awarded to Widman & Franklin, LLC as attorney fees and costs in the amount of \$10,000.00; and

**for a total of \$30,000.00.**

IT IS SO ORDERED:

This 4<sup>th</sup> day of June, 2018.

s/ Jeffrey J. Helmick

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Judge Jeffrey Helmick  
United States District Judge

APPROVED AS TO FORM AND CONTENT:

WIDMAN & FRANKLIN, LLC

SHUMAKER, LOOP & KENDRICK, LLP

/s/ Kera L. Paoff

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